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*Lead Counsel for Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
(SAN FRANCISCO DIVISION)**

IN RE: VIAGRA (SILDENAFIL CITRATE)  
PRODUCTS LIABILITY LITIGATION

This Document Relates to: ALL ACTIONS

**Master File No.: 3:16-md-02691-RS**

MDL No. 2691

**DECLARATION OF RACHEL ABRAMS  
IN SUPPORT OF PLAINTIFFS'  
[UNOPPOSED] MOTION FOR RELIEF  
FROM PRO HAC VICE FEE  
REQUIREMENTS AFTER INITIAL  
ADMISSION**

I, Rachel Abrams, declare as follows:

1. I am a partner with the law firm of Levin Simes LLP, Liaison Counsel for Plaintiffs in the above-captioned action. I am familiar with the matters set forth in this declaration based upon my own personal knowledge and my review of the files maintained in this case. If called as a witness, I could and would competently testify to the following facts.
2. Attached hereto as Exhibit 1 is a true and correct copy of the October 14, 2016, Transcript of Proceedings before The Honorable Richard Seeborg.
3. Attached hereto as Exhibit 2 is a true and correct copy of Pretrial Order # 1, United States District Court, Northern District of California, *In Re: TFT-LCD (Flat Panel) Antitrust Litigation*, Case No. M 07-1827 SI.

4. Attached hereto as Exhibit 3 is a true and correct copy of Pretrial Order No. 1, United States District Court, Northern District of California, *In Re: Roundup Products Liability Litigation*, Case No. 16-md-02741-VC.
5. Attached hereto as Exhibit 4 is a true and correct copy of Pretrial Order # 1, United States District Court, Northern District of California, *In Re: Bextra and Celebrex Marketing Sales Practices and Product Liability Litigation*, Case No. C 05-01699 CRB.
6. Attached hereto as Exhibit 5 is a true and correct copy of Case Management Order No. 3, United States District Court, Southern District of New York, *In Re: Fosamax Products Liability Litigation*, Case No. 1:06-MD-1789 (JFK).
7. Attached hereto as Exhibit 6 is a true and correct copy of MDL Order No. 1, United States District Court, District of Massachusetts, *In Re: Zofran (Ondansetron) Products Liability Litigation*, Case No. 1:15-md-2657-FDS.
8. Attached hereto as Exhibit 7 is a true and correct copy of Pretrial Order # 1, United States District Court, Southern District of West Virginia, Charleston Division, *In Re: American Medical Systems, Inc., Pelvic Repair Systems Product Liability Litigation*, Case No. 2:12-md-02325.
9. Attached hereto as Exhibit 8 is a true and correct copy of Pretrial Order No. 1, United States District Court, Northern District of California, *In Re: Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*, Case NO.: 3:15-md-02672-CRB.

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Pursuant to Title 28 of the United States Code §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 21, 2016.

Respectfully submitted,



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Rachel Abrams (CA #209316)

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*Liaison Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I, Rachel Abrams, hereby certify that on this 21<sup>st</sup> day of November, 2016, I electronically filed the foregoing with the Court using the CM/ECF system and thereby delivered by electronic means to all registered participants as identified on the Notice of Electronic Filing.

/s/ Rachel Abrams

Rachel Abrams (CA #209316)

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